

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

In re Helen J. Ellis

)
) Case No. 15-48117-659
) Chapter 13
)
) Response Due: 9/22/17

Debtor.

To: Prestige Financial Services
PO Box 26707
Salt Lake City, UT 84126

DEBTOR(S) OBJECTION TO CLAIM 2-1 OF PRESTIGE FINANCIAL SERVICES

THIS OBJECTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE OBJECTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE OBJECTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE OBJECTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING, THE DATE OF WHICH WILL BE SENT TO YOU IF YOU FILE A RESPONSE. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE OBJECTION AT THE HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEYS.

Debtor objects to the secured portion of your Claim No. 2-1 inasmuch as the retail value of your collateral, in its condition of the filing of this case, presumptively based at 97% of the NADA, did not exceed \$8,000.00. Your secured claim should be allowed in this amount and the balance should be allowed as a general unsecured claim

/s/Ross Briggs #2709 #31633

Ross Briggs
Attorney At Law
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served electronically this 1st day of ~~August~~ Sept, 2017 to Chapter 13 Trustee Diana Daugherty. and:

Prestige Financial Services
PO Box 26707
Salt Lake City, UT 84126

/s/ Ross Briggs